

January 4, 2024

VIA ECF

Hon. Sarah L. Cave
United States District Court
Southern District of New York
500 Pearl Street, Room 1670
New York, NY 10007

Re: *Dawnn Karen Mahulawde v. Fashion Institute of Technology, et al.*
Index No.: 1:21-cv-3878

Judge Cave:

We write pursuant to Your Honor's directive (ECF No.89) that the parties file a joint letter proposing a schedule for the completion of Plaintiff's deposition and expert discovery.

At the outset, Plaintiff's counsel was retained earlier this week and has not yet obtained Plaintiff's legal file from her prior counsel. Plaintiff's counsel hopes to obtain the file by next week. Accordingly, Plaintiff's counsel requires time to get up to speed on the case which is far along in the litigation.

On January 4, 2024, counsel for the parties conferred regarding a schedule for the remaining outstanding discovery. Defense counsel has stated their intentions to implement ESI protocols prior to Plaintiff's continued deposition based on additional late discovery disclosures. The parties will work in good faith to establish agreed-upon ESI protocols.

The parties agreed to the following schedule:

- 1) Plaintiff's continued deposition shall be completed by March 15, 2024;
- 2) Affirmative expert reports are due by April 30, 2024;
- 3) Rebuttal expert reports are due by June 7, 2024;
- 4) Depositions of experts shall be completed by July 15, 2024.

We thank the Court for its time and attention in this matter.

Respectfully submitted,

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Hon. Sarah L. Cave
Page 2

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